UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 17 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Phillip W. Henzler, Sr., Corporate Director
Bunting Bearing LLC
200-208 Van Buren Street
Delta, Ohio, 43515

Re: Notice of Violation
Bunting Bearing LLC
Delta, Ohio

Dear Mr. Henzler, Sr.:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Bunting Bearing LLC (Bunting) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Ohio State Implementation Plan at your facility located at 200-208 Van Buren Street, Delta, Ohio.

Section 113 of the Clean Air Act gives EPA several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

Through this letter EPA is offering Bunting an opportunity to confer with the Agency about the violations alleged in the NOV and to present information on the specific findings of violation, any efforts Bunting has taken to comply with the applicable laws and regulations and the steps it will take to prevent future violations. In addition, in order to make the conference more productive, EPA encourages Bunting to submit information relevant to the NOV prior to the conference date.

Please plan for the facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. Bunting may have an attorney represent it at this conference.

The EPA contact in this matter is Shilpa Patel. Please call her at (312) 886-0120 to request a conference. Please make the request within 10 calendar days following receipt of this letter. Any conference will be held within 30 calendar days following receipt of this letter.

Sincerely,

George T. Czerniak
Director
Air and Radiation Division

Enclosures: SBREFA fact sheet

cc: Robert Hodanbosi, Ohio EPA
Mark Budge, NWDO, Ohio EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Bunting Bearing LLC	)	**NOTICE OF VIOLATION**
Delta, Ohio	)	
	)	**EPA-5-15-OH-16**
Proceedings Pursuant to	)	
Section 113(a)(1) of the	)	
Clean Air Act, 42 U.S.C.	)	
§ 7413(a)(1)	)	

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). EPA finds that Bunting Bearing LLC (Bunting) is violating the Ohio State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. EPA approved Ohio Administrative Code (OAC) Rule 3745-31-02 as part of the federally enforceable SIP for Ohio on January 22, 2003 with a Federal effective date of March 10, 2003. 68 Fed. Reg. 2909.

2. EPA approved OAC Rule 3745-31-05(D) as part of the federally enforceable SIP for Ohio on January 22, 2003 with a Federal effective date of March 10, 2003. 68 Fed. Reg. 2909.

3. OAC Rule 3745-31-02(A)(1) states that no person shall cause, permit, or allow the installation of a new source of air pollutants or cause, permit, or allow the modification of an air contaminant source without first obtaining a permit to install from the director.

4. OAC Rule 3745-31-05(D) states that the director may impose such special terms and conditions as are appropriate or necessary to ensure compliance with the applicable laws and to ensure adequate protection of environmental quality. Special terms and conditions necessary to ensure compliance with requirements mandated by the Federal Clean Air Act or regulations promulgated by the administrator shall be federally enforceable and designated as such in the permit.

5. Bunting was issued a Final Permit to Install and Operate (PTIO) number P0108083 on October 29, 2012 which established Conditions 1.d.2, 2.d.2, 3.d.2, 1.d.3, 3.d.3, and 3.d.3.

6. The PTIO Number P0108083 states at Conditions 1.d.2, 2.d.2, and 3.d.2 that "the permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term 'fabric filter bag leak detection system' means a system that is capable of continuously monitoring relative particulate

emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition."

7. The PTIO Number P0108083 states at Conditions 1.d.3, 2.d.3, and 3.d.3 that "at a minimum, the permittee shall maintain the bag leak detection system in accordance with the following requirements:

a. keep onsite the necessary parts for routine repairs of the monitoring equipment;

b. keep records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests; and

c. conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance."

Bunting's Facility

8. Bunting owns and operates a non-ferrous foundry at 200-208 Van Buren Street, Delta, Ohio. Emission from the non-ferrous foundry are controlled by Baghouses A, B, and C.

9. Emissions from Bunting's non-ferrous foundry's Baghouses A, B, and C are subject to the monitoring requirements in the Ohio SIP at 3745-31-05(D) specified in PTIO Number P0108083 Conditions 1.d.2, 2.d.2, 3.d.2, 1.d.3, 3.d.3, and 3.d.3.

10. The only monitoring system installed on Baghouses A, B, and C's stacks is identified as CPM 5000 bought in or around October 11, 1996.

11. EPA conducted an unannounced inspection at Bunting on December 2, 2013.

12. EPA issued a 114 Request for Information to Bunting on November 7, 2014.

13. EPA held several calls with Bunting's General Manager, Kim Keogh, where additional questions, discussions, and clarifications occurred related to the CPM 5000 system.

14. During the inspection, EPA found no audible alarm on the CPM 5000 systems.

15. Bunting submitted the following information in response to EPA's information request:

    a. No alarms are present on the baghouses.

    b. Bunting manually records data from each CPM 5000 once a day.

    c. The CPM 5000 system has no alarm set points or delay times and that has not changed in the past five years.

    d. The CPM 5000 on Baghouse A is not working and will require replacement.

    e. The CPM 5000 on Baghouse A was not operational from February 2014 through December 2014 due to parts not being in stock.

16. During subsequent discussions with Mr. Keogh, Bunting made the following representations:

    a. CPM 5000 calibration information was not taken and therefore not available for review.

    b. A certification by the manufacturer for each CPM 5000 that is capable of detecting particulate emissions was not available for review.

    c. The CPM 5000 continuously records readings for 30 days and then rewrites over the data.

    d. Bunting does not have the capability to download the data from the CPM 5000.

    e. The recorded CPM 5000 data is analyzed to determine if drastic changes in the data have occurred.

    f. Bunting has not established an upper or lower bound for the CPM 5000's readings to determine when baghouse maintenance must occur.

g. Bunting is unaware of the direct correlation between the CPM 5000 reading and the PM concentration.

h. Bunting does not keep onsite the necessary parts for routine repairs of the monitoring equipment.

i. Bunting does not conduct monthly QA checks on the CPM 5000 system.

Violations

17. Bunting did not calibrate the CPM 5000 systems installed on the stacks of Baghouses A, B, and C in violation of PTIO Number P0108083 Conditions 1.d.2, 2.d.2, and 3.d.2.

18. Bunting did not have the certification that the CPM 5000 systems installed on the stacks of Baghouses A, B, and C were certified by the manufacturer to be capable of detecting particulate emissions in violation of PTIO Number P0108083 Conditions 1.d.2(a), 2.d.2(a), and 3.d.2(a).

19. Bunting did not continuously monitor and record the output signal from the sensor for the CPM 5000 units installed on the stacks of Baghouse A, B, and C in violation of PTIO Number P0108083 Conditions 1.d.2(b), 2.d.2(b), and 3.d.2(b).

20. Bunting's CPM 5000 units were not equipped with an audible alarm system that will alarm when an increase in relative particulate emissions loading is detected over a preset level in violation of PTIO Number P0108083 Conditions 1.d.2(c), 2.d.2(c), and 3.d.2(c).

21. Bunting's CPM 5000 units were not programmed with preset levels in order to detect an increase in relative particulate emissions loading in violation of PTIO Number P0108083 Conditions 1.d.2(c), 2.d.2(c), and 3.d.2(c).

22. Bunting did not establish a baseline output for each CPM 5000 in violation of PTIO Number P0108083 Conditions 1.d.2(d), 2.d.2(d), and 3.d.2(d).

23. Bunting did not establish the alarm set points or the alarm delay times for each CPM 5000 in violation of...by adjusting the sensitivity (range) and the averaging period of the devices, and the alarm set points and the alarm delay times in violation of PTIO Number P0108083 Conditions 1.d.2(d), 2.d.2(d), and 3.d.2(d).

24. Bunting's CPM 5000 units did not have an operations, maintenance, and monitoring plan required by its PTIO Number P0108083 in violation of Conditions 1.d.2(d), 2.d.2(d), and 3.d.2(d).

25. Bunting's CPM 5000 unit for Baghouse A was down from February 2014 through December 2014 due to lack of parts needed for routine repairs of the monitoring equipment as required by PTIO Number P0108083 in violation of Conditions 1.d.3(a), 2.d.3(a), and 3.d.3(a).

26. Bunting did not conduct monthly QA checks as required by PTIO Number P0108083 in violation of Conditions 1.d.3(c), 2.d.3(c), and 3.d.3(c).

Environmental Impact of Violations

27. These violations have caused or can cause excess emissions of PM and lead.

Particulate Matter: Particulate matter, especially fine particulates contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems.

Lead: The most common lead effects currently are neurological effects in children and cardiovascular effects (e.g., high blood pressure and heart disease) in adults. Infants and young children are especially sensitive to lead, which may contribute to behavioral problems, learning deficits and lowered IQ.

4/17/15
Date

George T. Czerniak
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-15-OH-16, by Certified Mail, Return Receipt Requested, to:

Mr. Phillip W. Henzler, Sr.
Bunting Bearing LLC
200-208 Van Buren St.
Delta, Ohio 43515

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
1800 Watermark Drive
Columbus, Ohio 43266-1049

Mark Budge, APC Manager
Northwest District Office
Ohio Environmental Protection Agency
347 North Dunbridge Road
Bowling Green, Ohio 43402

On the 20 day of April 2015.

Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2640 5434